



October 19, 2011

VIA ECF AND HAND DELIVERY

Honorable Joel A. Pisano, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

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**Re: *AstraZeneca AB, et al. v. Hanmi USA, Inc., et al.***  
**Civil Action No. 11-cv-0760 (JAP)(TJB)**

Dear Judge Pisano:

We represent Plaintiffs in this matter, and write concerning Defendants' five summary judgment motions filed on October 11. D.I. 97-117. We have copied Magistrate Judge Bongiovanni on this letter.

Defendants' motions are premature, and we believe it would be prudent to adjourn them until the completion of relevant discovery. These motions also raise claim construction issues that we believe would be best addressed during the ongoing *Markman* process.

We respectfully request a conference with Your Honor or Magistrate Judge Bongiovanni in order to discuss these issues and to arrive at a suitable schedule for the disposition of Defendants' motions.

Counsel for Plaintiffs are available for a conference on these issues at the Court's convenience.

Respectfully,

*s/John E. Flaherty*

John E. Flaherty

cc: Hon. Tonianne J. Bongiovanni (via ECF and email)  
Counsel of record (via email)

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